

EXHIBIT 17

REDACTED

1 UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF WASHINGTON
3 AT SEATTLE
4

5 In Re:)
6)
7) No. 2:21-cv-00563-JCC
8 VALVE ANTITRUST LITIGATION)
9)
10)

11 VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF
12 THOMAS GIARDINO
13

14 *** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***
15

16 9:04 A.M.

17 THURSDAY, NOVEMBER 2, 2023
18 701 FIFTH AVENUE, SUITE 5100
19 SEATTLE, WASHINGTON
20

21
22
23 Reported by: Tami Lynn Vondran, CRR, RMR, CCR/CSR
24 WA CCR #2157; OR CSR #20-0477; CA CSR #14435
25 Job Number 6276475

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24 Q. All right. So then Mr. Peterson, who had been
25 cc'd here, he responds just to you and says, "I want to

1 frame this and hang it on our cabal wall."

2 Those are his words; right?

3 A. Yes.

4 Q. And a cabal there is a small group -- as used
5 by Mr. Peterson, it's a small group at Valve; is that
6 right?

7 A. Yeah. I -- that term predates me at Valve. I
8 think "cabal" historically at Valve was shorthand for a
9 team or a product group. And so that's my
10 interpretation of how he uses it here as well.

11 Q. Okay. And he basically -- and so you and he
12 were part of the same cabal in this timeframe, 2019?

13 A. Yes. Erik and I worked on the same team, and
14 at this time we would have sat near each other in the
15 building as well.

16 Q. So he's basically saying, I want to frame this
17 and hang it near where we sit?

18 A. You'd have to ask him exactly what he meant,
19 but I can just read his words from the email.

20 Q. All right. Well, you responded and you said,
21 "gonna get it tattooed on my back like it's the
22 Declaration of Independence."

23 Those were your words?

24 A. Yes.

25 Q. I assume you never got that tattoo?

[illegible]